

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

KATHERINE HIGGINS

Debtor.

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**Case No. 24-32044-H3-13
(Chapter 13)**

MOTION TO CONVERT CHAPTER 13 CASE TO CHAPTER 7 CASE

1. This motion is filed by the Debtor.
2. Pursuant to 11 U.S.C. § 1307(a), the Debtor may convert this case to a case under chapter 7 “at any time.”
3. The Debtor elects to convert this case to a case under chapter 7 effective immediately.
4. The Debtor seeks an order to terminate any wage orders in effect.

August 8, 2024

/s/Reese W. Baker

Reese W. Baker

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ATTORNEYS FOR DEBTOR

CERTIFICATE OF SERVICE

I certify that on or about August 8, 2024, I caused a copy of the forgoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

I further certify that on August 9, 2024, I caused a copy of the following described documents to be served to all parties listed on the attached Mailing Matrix by U.S Mail, Postage Prepaid. Documents served were (1) Motion to Convert Chapter 13 Case to Chapter 7 Case, (2) Proposed Order on Motion to Convert Chapter 13 Case to Chapter 7 Case, and (3) Mailing Matrix.

/s/Reese W. Baker
Reese W. Baker